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January 24, 2001

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VIA HAND DELIVERY

Mr. K. David Waddell
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

REC'D TN
REGULATORY AUTH.
JAN 24 PM 2 51
EXECUTIVE SECRETARY

Re: Reply Comments Submitted on Behalf of Time Warner Telecom of the Mid-South, L.P. Regarding Reciprocal Compensation Provisions Contained in Certain BellSouth Telecommunications, Inc.'s Contract Service Arrangements.

Dockets: 00-00942, 00-00945, 00-00946 and 00-01015

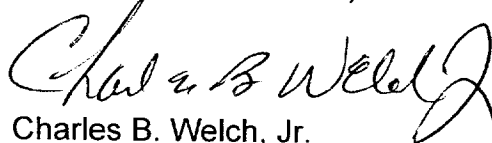
Dear Mr. Waddell:

Enclosed for filing, please find the original plus thirteen (13) copies of the Reply Comments Submitted on Behalf of Time Warner Telecom of the Midsouth, L.P. in the referenced docket.

If you have any questions or concerns with regard to this filing, please do not hesitate to contact me.

Very truly yours,

**FARRIS, MATHEWS, BRANAN,
BOBANGO & HELLEN, P.L.C.**


Charles B. Welch, Jr.

CBW:lw

Enclosures

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

**RECIPROCAL COMPENSATION
PROVISIONS CONTAINED IN CERTAIN
BELLSOUTH TELECOMMUNICATIONS,
INC.'S CONTRACT SERVICE
ARRANGEMENTS.**

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**Dockets: 00-00942, 00-00945,
00-00946 and 00-01015**

**REPLY COMMENTS SUBMITTED ON BEHALF OF
TIME WARNER TELECOM OF THE MID-SOUTH, L.P.**

Pursuant to notice previously issued by the Tennessee Regulatory Authority ("TRA"), Time Warner Telecom of the Mid-South, L.P. ("Time Warner") submits its reply comments as follows:

On January 19, 2001, BellSouth filed responses to TRA's Staff requests regarding the specific language of the reciprocal compensation provisions of the subject contract service arrangements. In response to request number 1, BellSouth submits that the language is intended to prohibit a scheme or improper arrangement between the customer and a third-party carrier which artificially creates a claim for reciprocal compensation. Time Warner agrees with BellSouth that these type arrangements are inappropriate and impermissible under applicable law.

If BellSouth insists upon including language in its CSA to prevent a situation described in its responses, this language should be expanded to clearly demonstrate the intent of the provision. Time Warner suggests language similar to the following:

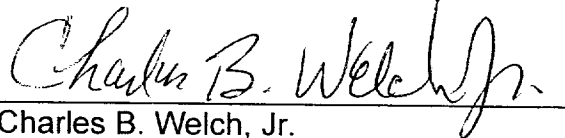
Customer and BellSouth acknowledge and agree that Customer has not been authorized by the Tennessee Regulatory Authority to provide regulated telecommunication services to the public and, therefore, Customer shall not be

permitted to enter into an agreement with any third-party for the purpose of creating an arrangement or scheme which results in a claim for reciprocal compensation by either party against BellSouth based upon the provisions of Section 251 of the 1996 Telecommunications Act or any interconnection agreement to which BellSouth is a party.

Whether the language provided herein is ultimately adopted or not, Time Warner contends that BellSouth should be required to include additional language to clarify the intent of the language originally proposed so that it is unquestionably consistent with the intent described in BellSouth's January 19, 2001 responses.

Respectfully submitted,

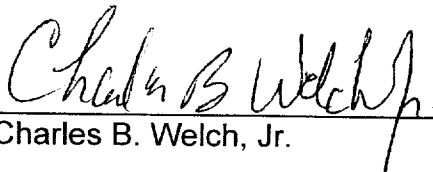
FARRIS, MATHEWS, BRANAN,
BOBANGO & HELLEN, P.L.C.

A handwritten signature in cursive script, reading "Charles B. Welch, Jr.", written over a horizontal line.

Charles B. Welch, Jr.
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following by placing same in U.S. Mail, postage prepaid, this the 24th day of January, 2001.



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